Florida Department of

Memorandum — Environmental Protection

TO: Rick Bradburn
THROUGH: Armando I. Sarasua, P.E.
FROM: Teresa R. Knepper, P.E
DATE: April 13, 2011
SUBJECT: Evaluation Summary for CEMEX Southeast, LLC; Pensacola Cement Distribution Terminal; 0330093-006-AO; Escambia County

We recommend issuing a renewal permit to CEMEX Southeast, LLC to operate their Pensacola (Olive Road) Cement Distribution Terminal. This permit follows 0330093-005-AO, effective July 6, 2006. There have been no changes to the facility since the last renewal.

Process Description.
This facility is a cement and pozzolan coal-fired combustion fly ash distribution terminal, which includes six 208-ton capacity silos with baghouse filters and a truck loading station with a filter integral to the loading spout. Cement or fly ash is received by railcars, which are unloaded by pneumatic conveyor or pneumatic transfer pump into any of the six silos at a maximum rate of 100 tons per hour. The facility's maximum throughput is 876,000 tons per year. Cement or fly ash is transferred from the silos to trucks for distribution at a maximum rate of 350 tons per hour.

Pollution Control Equipment.
Particulate matter (PM) emissions during silo loading are controlled by baghouse filters, one per silo, with the dust collected dropped back into its respective silo. PM emissions during truck loading are controlled by a filter system mounted on the loading spout that drops the filtered material into the truck being loaded. Filtered air is exhausted horizontally from the spout during loading.

Environmental Impact.

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions		Allowable Emissions	
		lbs/hr	T/yr	lb/hr	T/yr
PM	N/A	5.3*	7.33	N/A	N/A
SO2	N/A	N/A	N/A	N/A	N/A
VOC	N/A	N/A	N/A	N/A	N/A
NOx	N/A	N/A	N/A	N/A	N/A
CO	N/A	N/A	N/A	N/A	N/A
Objectionable Odors	62-296.320(2)	N/A	N/A	None allowed off plant property	
VE	N/A	N/A	N/A	20%	

* Based on unloading railcars and loading trucks simultaneously at maximum rates.

Applicable Rules & Regulations. This source is not regulated by any source-specific requirements.

This facility was previously regulated by a 5% visible emissions limit for the silos and loading spout filter discharge and no visible emissions from truck loading at the permittee's request. Said request originated in 1988 but it appears to have no rule basis. There are no Emissions Unit-specific PM limitation or test requirements. The 5% visible emissions limit was changed in this permitting action to 20% per the general facility-wide VE standard.

The following specific condition has been removed because there is no regulatory requirement for it, because years of compliance history in the form of TCLP analysis indicate that the material is not hazardous if it were a waste, and because the material is not a waste but a raw material used in the production of cement:

> **A.11**. The owner or operator shall verify that the fly ash received from each specific source is not defined as hazardous, per 40CFR 261.2. Verification must be made using the methods described in 40CFR 262.11. [Rule 62-4.070, F.A.C.]

Compliance Monitoring. Throughput and baghouse pressure drop are monitored.

Compliance History. While witnessing the visible emissions testing conducted on April 10, 2006, the Department inspector observed visible emissions in excess of the requirements from both the silos and the loading spout. As a result, a compliance plan was required from the facility. Provisions of the compliance plan were not incorporated in the subsequent operating permit, so they are being included in the current renewal as Appendix O&M. All subsequent inspections of the facility have been deemed in compliance although visible emissions using Method 22 were reported from the truck loading spout seal during two compliance tests (5/10/07 and 4/6/10) for one second. Also, during the last site inspection conducted by the Department on April 8, 2010, the Department inspector witnessed two separate malfunctions that resulted in excessive emissions.

Fee Summary. This is an AO2B ($1,000 fee) minor source with no stack test. The source was originally permitted to operate as an existing source with six emissions units ($600).

TK/c